

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

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ANDRE BISASOR,  
Plaintiff

Vs.

CASE NO.: 1:23-CV-00374-JL

CRAIG DONAIS, RUSSELL HILLIARD,  
DONAIS LAW OFFICES PLLC,  
UPTON AND HATFIELD LLP and  
MARY K. DONAIS,  
Defendants

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**DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS AND DONAIS LAW OFFICES  
PLLC’S OBJECTION TO EMERGENCY/EXPEDITED  
PLAINTIFF’S MOTION TO STAY THE DEADLINE FOR  
REFILING THE SUPPLEMENTAL OPPOSITION TO THE DONAIS DEFENDANTS’  
MOTION TO DISMISS UNTIL THE ACCOMPANYING PENDING MOTIONS FILED  
TODAY ARE RESOLVED (DOC. 111)**

NOW COME the Defendants Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC (jointly the “Donais Defendants”) and object to Plaintiff Andre Bisasor’s (“Plaintiff”) Emergency/Expedited Motion To Stay the Deadline for Refiling the Supplemental Opposition to the Donais Defendants’ Motion to Dismiss Until the Accompanying Pending Motions Filed Today Are Resolved (Doc. 111) (“Plaintiff’s Motion”). The Donais Defendants object to any stay of these proceedings.

To the extent that Plaintiff seeks a stay to refile his objection to the Donais Defendants’ Motion to Dismiss, this motion is moot. On 11/20/23, Plaintiff refiled his objection. (See Doc. 118.)

Moreover, there is no grounds upon which a stay is warranted. Rather, Plaintiff once again seeks to delay adjudication of the Donais Defendants’ Motion to Dismiss by requesting a stay due to his having filed multiple motions (see generally Docs. 107 through 118, all filed on 11/20/23 to include Plaintiff’s Motion). The Donais Defendants continue to deny all wrongdoing, and they rightfully would like to move forward in this matter. This Court should deny any request for a stay.

As such, Craig S. Donais, Mary K. Donais and Donais Law Offices PLLC, respectfully request:

- A. That this Court deny the Plaintiff's Motion as moot; and
- B. Grant such other and further relief as is equitable and just.

Respectfully submitted,

FOR THE DEFENDANTS,  
CRAIG DONAIS, DONAIS LAW OFFICES  
PLLC and MARY K. DONAIS

*/s/ Linda M. Smith*

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing **OBJECTION** to all parties in this action by serving same via electronic mail to:

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Date: November 27, 2023

*/s/ Linda M. Smith*  
Linda M. Smith